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AUG 9 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: **Notice of Proposed Rule Making**
In the Matter of Amendment of Section 73.202(b), Table of Allotments,
FM Broadcast Stations (Dayton, Incline Village and Reno, Nevada)
MM Docket No. 99-229, RM-9479

Dear Ms. Salas:

On behalf of Salt Broadcasting, L.L.C. and Americom Las Vegas Limited Partnership, I am transmitting herewith an original and four copies of their Joint Comments in the above-referenced matter.

Should there be any questions concerning this matter, please contact the undersigned.

Very truly yours,



Ross G. Greenberg

RGG:rg
Enclosures

No. of Copies rec'd 0+4
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BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

RECEIVED

AUG 9 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,) MM Docket No. 99-229
FM Broadcast Stations.) RM-9479
(Dayton, Incline Village and Reno, Nevada))

To: Chief, Allocations Branch

**JOINT COMMENTS OF SALT BROADCASTING, L.L.C.
AND AMERICOM LAS VEGAS LIMITED PARTNERSHIP**

Salt Broadcasting, L.L.C. ("Salt"), licensee of broadcast Station KTHX-FM, Incline Village, Nevada, and Americom Las Vegas Limited Partnership ("Americom," and, with Salt, the "Petitioners"), licensee of broadcast Station KRNO-FM, Reno, Nevada, by their attorneys, hereby comment on the Commission's Notice of Proposed Rule Making in the above-captioned proceeding, DA 99-1173 (released June 18, 1999) (the "Notice").^{1/} The Commission issued the Notice pursuant to the Petitioners' January 20, 1999 Joint Petition for Rule Making (the "Petition"), requesting that the Commission institute a rule making proceeding to amend Section 73.202(b), the FM Table of Allotments, by deleting Channel 261C2 at Incline Village,

^{1/} The Petitioners were instructed to submit comments in this proceeding pursuant to Paragraph 5 of the Notice and Paragraph 2 of the Appendix attached thereto.

Nevada, and assigning Channel 261C1 for use at Dayton, Nevada, and reallocating Channel 295C from Reno, Nevada, to Incline Village, Nevada.

The Petition, attached hereto as Attachment 1, demonstrates that the Petitioners' request is in full accord with Commission minimum distance separation and city grade coverage requirements and that grant of the amendments proposed therein would result in a preferential arrangement of allotments pursuant to the Commission's change of community procedures and would benefit communities most in need of local transmission service. As noted in the Petition, the proposed change for KTHX-FM would provide Dayton with its first local service. In order to prevent a loss of local transmission service which otherwise would result from the reallocation of KTHX-FM from Incline Village to Dayton, the Petitioners propose to change the allotment of KRNO-FM from Reno to Incline Village. Thus, the community of Incline Village will not only receive a replacement service, but a superior one, operating with Class C, rather than Class C2, facilities. Although Reno will "lose" Channel 295C, it will continue to be served by an abundance of other radio stations currently licensed to that city.

In its Notice, the Commission noted that the Petitioners did not base their gain and loss studies for Channel 261C1 at Dayton on the allotment coordinates proposed in the Petition but rather on the site which Salt actually intends to use, and the Commission requested that the Petitioners provide loss and gain showings based on the coordinates proposed in the Petition. Notice at ¶ 5. Submitted herewith on behalf of the Petitioners as Attachment 2 is an Engineering Statement of Hatfield & Dawson which provides the requested showings. With respect to the technical aspect of the KTHX-FM proposal, it is respectfully noted that the upgrade from a Class

C2 to a Class C1 channel and operation from the coordinates proposed in the Petition would result in a service gain area of 11,454 square kilometers containing 33,303 persons. The loss area from that site would encompass 3,136 square kilometers and 77,820 persons. The entire loss area is well served, with at least 5 full-time radio stations serving the entire area. By contrast, only 69% of the gain area (7,922 square kilometers containing 32,754 persons) is well-served, with at least 5 reception services over the area, and 31% of the gain area (3,532 square kilometers containing 549 persons) is currently underserved. 10% of the gain area (1,131 square kilometers containing 3 persons) currently receives full-time service from just one other radio station, and 0.3% of the gain area (32 square kilometers, population 0) currently receives no full-time service from any other radio station. See Attachment 2 hereto.

In considering a reallocation proposal, the Commission compares “the proposed allotment plan to the existing state of allotments for the communities involved. If adoption of the proposed allotment plan would result in a net service benefit for the communities involved (that is, if the plan would result in a preferential arrangement of allotments), [the Commission] will adopt the proposal.” Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989) (“FM Modification”) at ¶ 25. The Commission applies the FM allotment priorities and policies first set forth in Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982) (“FM Assignment”), to determine whether an FM reallocation proposal results in a preferential

arrangement of allotments, “apply[ing] the allotment criteria in a flexible manner where circumstances warrant.” FM Modification at ¶ 25.^{2/}

Because the allotment site study predicts elimination of a white area of 32 square kilometers without any population, and since the study does not predict the creation of any white area, priority one is not materially implicated. The allotment site facilities would provide coverage to a gray area with a population of three, in furtherance of priority two,^{3/} and since Dayton would receive its first local service under the proposal, the Petitioners satisfy priority three, which is given co-equal weight with priority two. Since the allotment site study does not predict the creation of any gray area, nor does the proposal deprive any community of its first local service, the Petitioners’ proposal clearly results in a preferential arrangement of allotments.

^{2/} The allotment priorities are as follows:
 (1) First full-time aural service;
 (2) Second full-time aural service;
 (3) First local service; and
 (4) Other public interest matters.
Co-equal weight is given to priorities (2) and (3).

^{3/} Although coverage of a gray area containing three people most likely would be considered *de minimis* (see Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Seabrook, Huntsville, Bryan, Victoria, Kenedy, and George West, Texas), 10 FCC Rcd 9360 (1995); Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Bon Air, Chester, Mechanicsville, Ruckersville, Williamsburg and Fort Lee, Virginia), 11 FCC Rcd 5758 (1996)), provision of first or second aural service to relatively small populations is not entirely disregarded. See Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Wray and Otis, Colorado), 1998 FCC Lexis 607 (1998) at ¶ 5; Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Winner and Wessington Springs, South Dakota), 12 FCC Rcd 16393 (1997) at ¶ 3.

It should be noted that all persons in the predicted loss area from the allotment site are well-served, and this hypothetical^{4/} loss of service does not overcome the proposal's merits. See Notice of Proposed Rule Making, Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Pauls Valley and Healdton, Oklahoma), 1998 FCC Lexis 2829 (1998) at ¶ 3 (where proposal would provide community with its first local service, "[a]lthough it appears that the station would serve fewer people if reallotted . . . , both the loss and gain areas are completely covered by at least five fulltime services and thus are considered to be well served"); Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Georgetown and Millsboro, Delaware), 11 FCC Rcd 14445 (1996) at ¶ 4 ("[w]hile we carefully evaluate any proposal that would result in the loss of existing service, the loss area . . . is completely covered by at least five full-time reception services and is, therefore, considered to be well served"); Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Willows and Dunnigan, California), 10 FCC Rcd 11522 (1995) at ¶ 16 ("our concern about removal of [the community's] only local night-time transmission service is ameliorated by the fact that that community will continue to receive at least five full-time reception services, and therefore, is considered to be a well-served area"). In the instant case, the population in the hypothetical loss area is well served by other stations, and the gain area encompasses 549 persons who are currently underserved. Accordingly, because an underserved population is predicted to receive

^{4/} As demonstrated in the Petition, attached hereto as Attachment 1, Salt intends to operate from a transmitter site that will produce an actual gain area of 7,106 square kilometers containing 24,146 persons and a loss area of only 12 square kilometers containing 4 persons.

service from the allotment site and because Salt will provide a first local service to Dayton, the Petitioners' proposal results in a preferential arrangement of allotments within the bounds of existing precedent and should be authorized.

* * *

In sum, the reallocations proposed herein will result in a first local, Class C1 service for Dayton and an upgrade of Incline Village's only station from Class C2 to Class C facilities. In addition, a net extension of service covering 8,318 square kilometers and an underserved population of 549 persons is predicted from the allotment site. These public interest benefits are more than sufficient to outweigh the removal of one service from the community of Reno, which is otherwise well served, and the hypothetical loss of service to an otherwise well-served population. The Petitioners hereby reiterate their intention to apply for the channels if


reallotted and, if authorized, to build the stations promptly. Accordingly, the Petitioners respectfully submit that the allotments proposed in the Notice would serve the public interest and should be implemented.

Respectfully submitted,

AMERICOM LAS VEGAS LIMITED PARTNERSHIP

SALT BROADCASTING, L.L.C.

By:


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August 9, 1999

Their Attorneys

ATTACHMENT 1

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.202(b),)	
Table of Allotments,)	MM Docket No. 98 - _____
FM Broadcast Stations)	RM _____
(Reno, Incline Village and Dayton, Nevada))	

To: Chief, Allocations Branch

JOINT PETITION FOR RULE MAKING

Salt Broadcasting, L.L.C. ("Salt"), licensee of broadcast Station KTHX-FM, Incline Village, Nevada, and Americom Las Vegas Limited Partnership ("Americom," and, with Salt, the "Petitioners"), licensee of broadcast Station KRNO-FM, Reno, Nevada, pursuant to Section 1.401 of the Commission's Rules, hereby request that the Commission institute a rule making proceeding to amend Section 73.202(b), the FM Table of Allotments, by deleting Channel 261C2 at Incline Village, Nevada, and assigning Channel 261C1 for use at Dayton, Nevada, and reallocating Channel 295C from Reno, Nevada, to Incline Village, Nevada.^{1/}

Submitted herewith on behalf of the joint petitioners as Attachment 1 is an Engineering Statement of Hatfield & Dawson demonstrating that this petition is in full accord

^{1/} Salt and Americom are filing this petition jointly in satisfaction of an agreement between the parties, reached when Americom assigned the license of KTHX-FM to Salt. As a condition to the assignment, Americom agreed to cooperate with Salt in its efforts to upgrade the facilities of KTHX-FM.

with Commission minimum distance separation and city grade coverage requirements.^{2/} Grant of the amendments proposed herein would result in a preferential arrangement of allotments pursuant to the Commission's change of community procedures, Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), reconsideration granted in part, denied in part, 5 FCC Rcd 7094 (1990), and would benefit communities most in need of local transmission service. Under this precedent, these changes are to be made without opening either allotment to new applicants. See Id.

The proposed change for KTHX-FM would provide Dayton with its first local service. Dayton, listed in the 1990 census with a population of 2,217, has its own post office and zip code, its own police force, jail and courthouse, several banks, an extensive school system comprised of two elementary, one intermediate and one high school, a library, and a volunteer fire house. Telephone Interview by Ross G. Greenberg of Michelle Jolly, Secretary of Dayton Area Chamber of Commerce (Oct. 6, 1998); The Dayton Area Chamber of Commerce Map (1997). The closest urbanized area is Carson City, Nevada, which is approximately twelve miles distant. Id. Accordingly, it is clear that Dayton is an independent community deserving of its first local transmission service.

^{2/} It is requested that Channel 295C be allotted to Incline Village, Nevada at the current licensed site of KRNO-FM. This site is approximately 10.1 kilometers northeast of Incline Village. The hypothetical site for Channel 261C1 at Dayton, Nevada is located 36.8 kilometers northeast of Dayton. Attachment 2 hereto is a supplemental Engineering Statement from Hatfield & Dawson which reports on the projected coverage gains and losses from McClellan Butte, which is the actual site from which KTHX-FM proposes to operate as a Class C1 station.

With respect to the technical aspect of the KTHX-FM proposal, it is respectfully noted that the upgrade from a Class C2 to a Class C1 channel and operation from the McClellan Butte transmitter site identified in Attachment 2 hereto, would result in a service gain area of 7,106 square kilometers containing 24,146 persons. The loss area from that McClellan Butte site, by contrast, would encompass, by contrast, only 12 square kilometers and 4 persons. The entire gain/loss area is well served, with at least 10 reception services over the entire area. See Attachment 2 hereto.

In order to prevent a loss of local transmission service which otherwise would result from the reallocation of KTHX-FM from Incline Village to Dayton, Americom proposes to change the allotment of KRNO-FM, Channel 295C, from Reno to Incline Village. Thus, the community of Incline Village will not only receive a replacement service, but a superior one, operating with Class C, rather than Class C2, facilities.^{3/} As no change is proposed in the transmitter site of KRNO-FM, there will be no gain or loss in reception service. The only "loss" will be the removal of Channel 295C from Reno. However, Reno will continue to be served by many other radio stations currently licensed to that city.^{4/} These remaining stations will be more than sufficient to serve its needs.

In sum, the reallocations proposed herein will result in a first local, Class C1 service for Dayton; an upgrade of Incline Village's only station from Class C2 to Class C

^{3/} Incline Village-Crystal Bay is listed in the 1990 census with a population of 7,119.

^{4/} Those stations include: KCBN(AM), KDOT(FM), KHIT(AM), KKOI(AM), KNEV(FM), KNHK(FM), KOZZ-FM, KPTT(AM), KQLO(AM), KRNV-FM, KUNR(FM), KXEQ(AM) and KXTO(AM). Broadcasting & Cable Yearbook 1998, pp. D-275, D-276.

facilities; and a net extension of service to 24,142 persons. These public interest benefits are more than sufficient to outweigh the removal of one service from the community of Reno, which is otherwise well served. Accordingly, the Petitioners respectfully submit that the allotments proposed herein would serve the public interest and should be implemented.

WHEREFORE, for the reasons stated above, a rule making proceeding should be instituted to amend Section 73.202(b) to delete Channel 261C2 at Incline Village, Nevada, and assign Channel 261C1 for use at Dayton, Nevada, and to reallocate Channel 295C from Reno, Nevada, to Incline Village.

Respectfully submitted,

AMERICOM LAS VEGAS LIMITED PARTNERSHIP
SALT BROADCASTING, L.L.C.

By:



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January 20, 1999

ATTACHMENT 1

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ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO
AMEND SECTION 73.202 OF THE RULES
AND REGULATIONS OF THE FEDERAL
COMMUNICATIONS COMMISSION

TO ASSIGN

FM CHANNEL 261C1
FOR USE AT DAYTON, NEVADA
&
FM CHANNEL 295C FOR USE
AT INCLINE VILLAGE, NEVADA

SALT BROADCASTING, L.L.C.
&
AMERICOM LAS VEGAS LIMITED PARTNERSHIP

10/98

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Salt Broadcasting, L.L.C. and Americom Las Vegas Limited Partnership in support of a petition for Rulemaking to amend §73.202 of the Commission's Rules to assign channel 261C1 for use at Dayton, Nevada and channel 295C for use at Incline Village, Nevada. Salt Broadcasting, L.L.C. is the licensee of FM radio station KTHXFM, channel 261C2, Incline Village, Nevada. Americom Las Vegas Limited Partnership is the licensee of FM radio station KRNOFM, channel 295C, Reno, Nevada.

This petition proposes (1) assignment of channel 261C1 for use at Dayton, Nevada, and deletion of channel 261C2, Incline Village, Nevada; and (2) assignment of 295C for use at Incline Village, Nevada, and deletion of 295C at Reno, Nevada. As outlined in the attached channel studies, channel 261C1 can be assigned for use at Dayton, Nevada, from a hypothetical site located 36.8 kilometers northeast of Dayton, in complete compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, upon deletion of channel 262C2, Incline Village, Nevada (currently used by KTHXFM). Additionally, channel 295C can be assigned for use at Incline Village, Nevada, from the KRNO licensed site, in complete compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, upon deletion of channel 295C, Reno, Nevada (currently used by KRNOFM).

Hatfield & Dawson Consulting Engineers

Upon approval of the Petition for Rulemaking, an application for construction permit will be filed on behalf of KTHXFM for operation on 261C1, serving Dayton. The hypothetical site specified in this Engineering Statement is located 36.8 kilometers northeast of Dayton. The nominal distance to the 70 dBu F(50,50) contour for a Class C2 station is 50 kilometers; therefore, this site can be presumed to provide greater than 70 dBu coverage to all of Dayton. An application for construction permit will also be filed on behalf of KRNO for operation on 295C, serving Incline Village. The site specified in this Engineering Statement is the current licensed site of KRNO. It is located 10.1 kilometers northeast of Incline Village. The nominal distance to the 70 dBu F(50,50) contour for a Class C station is 67.6 kilometers; therefore, this site can be presumed to provide greater than 70 dBu coverage to all of Incline Village.

Hatfield & Dawson Consulting Engineers

Seattle, WA

FM SEPARATION STUDY

Job Title :Hypothetical Site Dayton, Nevada

Separation Buffer 100 km

FCC DB Date : 09/25/98

Channel 261C1 (100.1 MHz)

Coordinates : 39-29-27 119-19-03

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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K207CP	South Lake Tahoe	207D	0.01	DA	39-06-11	229.3	65.96	0
CP	NV	BPFT980127TB	89.3	675.0	119-53-48		.00	TRANS
Translator for KAWZ, Twin Falls, ID								
Vertical Polarization Only								

KVCE	Fallon	208A	0.38		39-29-22	90.1	39.61	22
LIC	NV	BLED870416KA	89.5	35.0	118-51-26		17.61	CLEAR

NEW	Reno	208A	5.0	DA	39-34-20	282.6	42.26	22
APP	NV	BPED951127MA	89.5	-1.0	119-47-51		20.26	CLEAR

NEW	Hawthorne	208C2	.320		38-27-28	157.2	124.30	27
APP	NV	BPED960118MH	89.5	954.0	118-45-52		97.30	CLEAR

K258AH	Roseville	258D	.038		38-44-52	244.2	186.39	0
LIC	CA	BLFT980213TE	99.5	72.0	121-15-00		.00	TRANS
Translator for KLVC, Magalia, CA.								

K259AK	Carson City	259D	.006	DA	39-12-50	231.7	49.64	0
LIC	NV	BLFT971117TC	99.7	370.0	119-46-10		.00	TRANS
Translator for KAWZ, Twin Falls, ID								
Vertical Polarization Only								

KRCXFM	Marysville	260B	1.75		39-12-20	262.4	217.99	195
LIC	CA	BMLH961108KB	99.9	665.0	121-49-10		22.99	CLEAR

KCIV	Mount Bullion	260B	1.85		37-32-00	196.0	225.88	195
LIC	CA	BLH890601KD	99.9	640.0	120-01-29		30.88	CLEAR

KTHXFM	Incline Village	261C2	0.82		39-18-38	247.8	52.72	224
LIC	NV	BLH980116KB	100.1	907.0	119-53-01		-171.28	SHORT

K261AY	Bridgeport, etc.	261D	.008	DA	38-05-28	174.6	156.08	0
LIC	CA	BLFT841107TA	100.1	505.0	119-08-55		.00	TRANS
Translator for KIBS, Bishop, CA.								

KQOD	Stockton	261A	6.0		37-59-33	225.2	234.20	200
CP	CA	BPH971021IC	100.1	100.0	121-12-50		34.20	CLEAR

KQOD	Stockton	261A	6.0		38-01-21	226.6	235.16	200
LIC	CA	BMLH901203KB	100.1	87.0	121-16-03		35.16	CLEAR

Seattle, WA

FM SEPARATION STUDY

Job Title :Hypothetical Site Dayton, Nevada

Separation Buffer 100 km

FCC DB Date : 09/25/98

Channel 261C1 (100.1 MHz)

Coordinates : 39-29-27 119-19-03

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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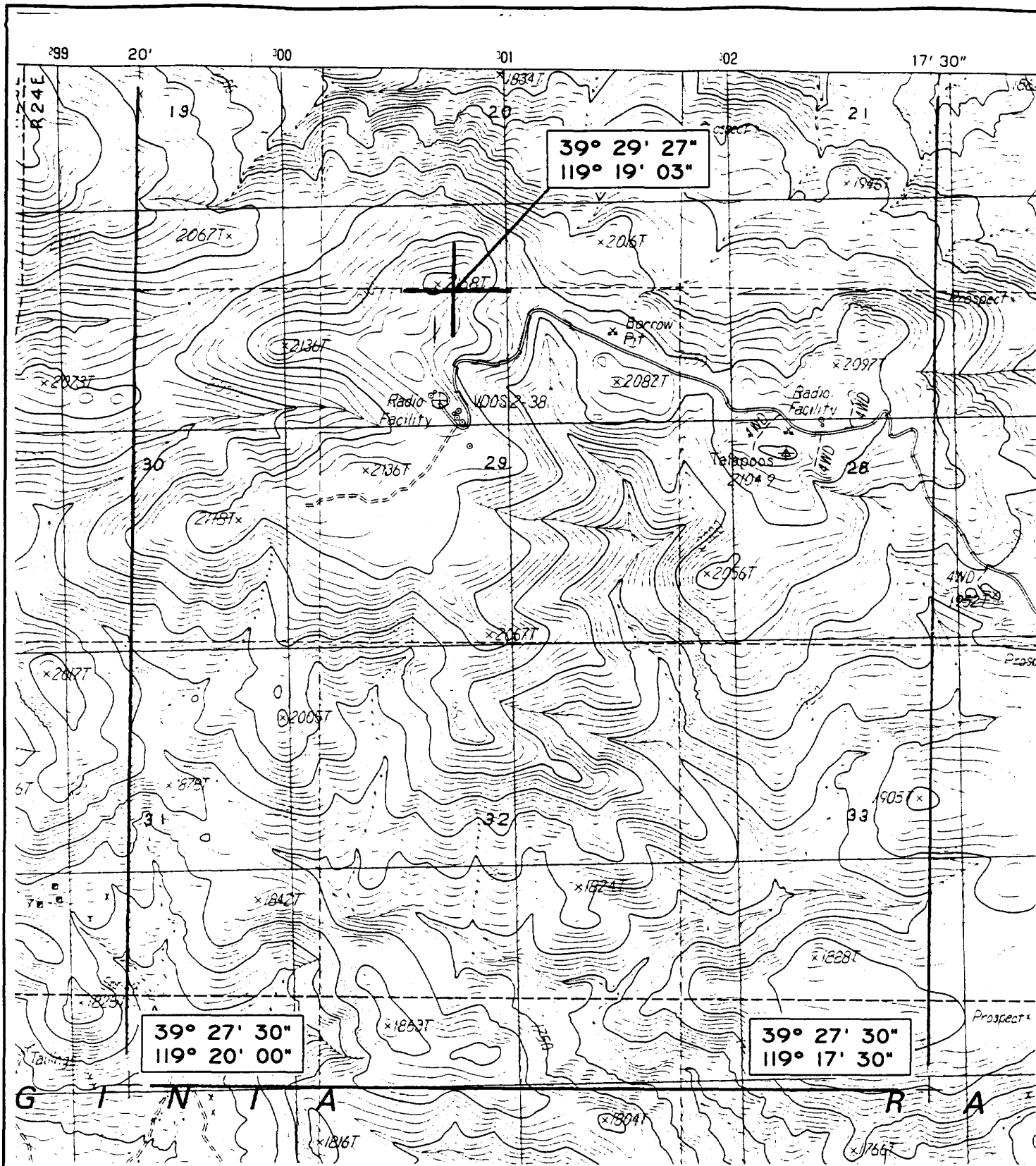
NEW	Beatty		261C	100.	36-59-39	141.0	353.29	270
APP	NV	BPH970925MM	100.1	460.0	116-48-52		83.29	CLEAR
Amended 971217-Amended 980615 From Channel 262A per one-step application amendment.								

	Beatty		261C		36-59-39	141.0	353.29	270
ALC	NV		100.1	.0	116-48-52		83.29	CLEAR
To Channel 261C per one-step application								

KSPY	Quincy		262A	0.90	39-56-14	290.1	148.31	133
LIC	CA	BLH970130KC	100.3	-343.0	120-56-51		15.31	CLOSE

KZZO	Sacramento		263B	115.	DA 38-38-30	238.9	180.09	79
LIC	CA	BLH890807KA	100.5	100.0	121-05-25		101.09	CLEAR
GRANDFATHERED AT 115 kW ERP and 100 meters HAAT								

** End of separation study for channel 261C1 **



STOCKTON WELL
QUADRANGLE

NEVADA
7.5 MINUTE TOPOGRAPHIC

SCALE 1:24 000

0 MILES

1

2

0 KILOMETERS

1

2

HATFIELD & DAWSON
CONSULTING ENGINEERS

HYPOTHETICAL TRANSMITTER SITE MAP
DAYTON, NEVADA
10/98

Seattle, WA

FM SEPARATION STUDY

Job Title : Incline Village, Nevada

Separation Buffer 100 km

FCC DB Date : 09/25/98

Channel 295C (106.9 MHz)

Coordinates : 39-18-38 119-53-01

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
K241AK CP	Verdi, etc. NV	BPFT970723TA	241D 96.1	.070 933.0	DA 39-34-38 119-56-19	351.0	29.99 .00	0 TRANS
Translator for KRZQ, Tahoe City, CA. Vertical Polarization Only								
NEW APP	Susanville CA	951108MX	242C3 96.3	2.3 332.0	40-27-13 120-34-14	335.5 SS	139.87 108.87	31 CLEAR
K292EP LIC	Incline Village NV	BLFT920130TB	292D 106.3	.024 61.0	DA 39-13-26 120-00-14	227.1	14.16 .00	0 TRANS
Translator for KRNO, Reno, NV.- Translator site located in CA.								
K292EX LIC	Reno, Sparks NV	BLFT970519TF	292D 106.3	.028 338.0	39-35-02 119-47-51	13.6	31.25 .00	0 TRANS
Translator for KAWZ, Twin Falls, ID								
NEW APP	Willows CA	BPH961023MI	292A 106.3	6.0 100.0	39-26-35 122-04-23	275.2 SS	189.24 94.24	95 CLEAR
NEW APP	Willows CA	BPH961022ME	292A 106.3	6.0 100.0	39-26-35 122-04-23	275.2 SS	189.24 94.24	95 CLEAR
NEW APP	Willows CA	BPH961025MB	292A 106.3	6.0 100.0	39-25-47 122-04-48	274.7	189.75 94.75	95 CLEAR
ALC	Willows CA	Docket94-126	292A 106.3	.0	39-25-56 122-04-50	274.8	189.81 94.81	95 CLEAR
Site Restricted 14.1 km Southeast-Effective 9-23-96								
KWOD LIC	Sacramento CA	BLH830216AD	293B 106.5	50. 125.0	38-38-30 121-05-25	234.9	128.26 23.26	105 CLEAR
KMMT LIC	Mammoth Lakes CA	BLH940712KX	293B1 106.5	0.36 723.0	37-37-42 119-01-47	158.1	201.05 96.05	105 CLEAR
NEW-T APP	Mariposa, etc. CA	BPFT970825TH	294D 106.7	.01 886.0	37-32-01 120-01-46	183.7	197.67 .00	0 TRANS
Translator for KMRO, Camarillo, CA								
KRQR LIC	Orland CA	BLH950608KA	294B 106.7	26. 63.0	39-53-17 122-37-38	286.2	244.22 27.22	217 CLEAR

Seattle, WA

FM SEPARATION STUDY

Job Title : Incline Village, Nevada

Separation Buffer 100 km

Channel 295C (106.9 MHz)

FCC DB Date : 09/25/98

Coordinates : 39-18-38 119-53-01

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KRQR CP	Orland CA	BPH950627IC	294B 106.7	50.0 DA 94.0	39-53-16 122-37-38	286.1	244.22 27.22	217 CLEAR
KRNOFM LIC	Reno NV	BLH870805KC	295C 106.9	37. 911.0	39-18-38 119-53-01	.0	.00 -290.00	290 SHORT
KQLB LIC	Los Banos CA	BLH921207KI	295A 106.9	6.0 100.0	36-55-35 120-50-42	197.9	277.74 51.74	226 CLEAR
KEAR CP	San Francisco CA	BPED970703IB	295B 106.9	80. 305.0	37-51-04 122-29-50	235.3	279.49 5.49	274 CLOSE
GRANDFATHERED AT 80KW / 305 M HAAT Commercial Channel Operating Noncommercial								
KEAR LIC	San Francisco CA	BLH781120AD	295B 106.9	80. 341.0	37-50-58 122-29-56	235.3	279.71 5.71	274 CLOSE
GRANDFATHERED AT 80KW @ 341M HAAT.								
KKRB LIC	Klamath Falls OR	BLH870824KC	295C1 106.9	51. 206.0	42-13-26 121-49-02	333.9	362.38 92.38	270 CLEAR
KMMM LIC	Madera CA	BLH971124KH	296B1 107.1	9.9 157.0	37-07-40 119-40-38	175.7	242.96 49.96	193 CLEAR
One-Step Application from Channel 297A								
K296BR LIC	Big Bend & Bush Bar CA	BLFT830815MN	296D 107.1	.001 278.0	41-00-50 121-57-00	317.8	258.38 .00	0 TRANS
TRANSLATOR FOR KALF, RED BLUFF, CA.								
KISK CP	Shasta Lake City CA	BPH960717MA	296C3 107.1	1.40 415.0	40-39-06 122-31-32	304.4	270.37 94.37	176 CLEAR
KSTNFM LIC	Stockton CA	BLH3869	297B 107.3	8.1 491.0	37-49-17 121-46-49	225.5	233.78 128.78	105 CLEAR
GRANDFATHERED AT 8.1KW @ 491M HAAT. Horizontally Polarized only.								
KSAC CPM	Sutter Creek CA	BMPH980630IB	298A 107.5	3.1 140.0	38-25-42 120-33-31	211.0	114.13 19.13	95 CLEAR
amended 980710								
KSAC LIC	Sutter Creek CA	BLH960605KF	298A 107.5	6.0 100.0	38-22-11 120-38-36	212.4	123.54 28.54	95 CLEAR

Seattle, WA

FM SEPARATION STUDY

Job Title :Incline Village, Nevada

Separation Buffer 100 km

FCC DB Date : 09/25/98

Channel 295C (106.9 MHz)

Coordinates : 39-18-38 119-53-01

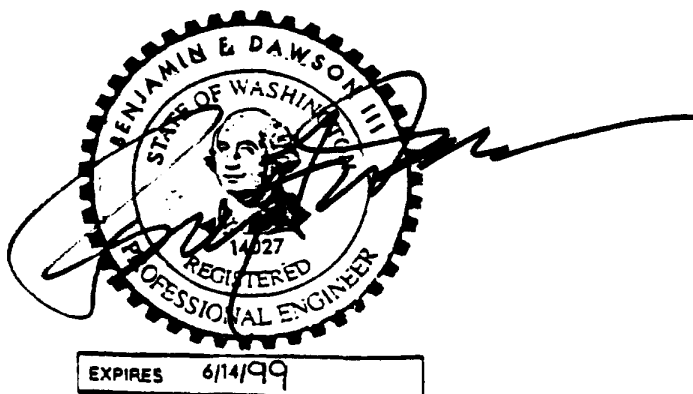
Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KPPL-1 LIC	Yuba City CA	BLFTB890731TC	298D 107.5	.086 616.0	DA 39-12-21 121-49-11	266.6	167.53	0 .00 BOOST

** End of separation study for channel 295C **

CERTIFICATION

This Engineering Statement has been prepared on behalf of Salt Broadcasting, L.L.C. and Americom Las Vegas Limited Partnership supporting a Petition for Rulemaking to revise the Table of Allotments to specify channel 261C1 for use at Dayton, Nevada, and channel 295C for use at Incline Village, Nevada. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson, Consulting Engineers, and am Registered as a Professional Engineer in the States of California and Washington.

October 5, 1998



Benjamin F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers

ATTACHMENT 2

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Engineering Statement

An engineering study has been conducted in order to determine whether the proposed reallocation of FM channel 261C2 at Incline Village, Nevada to FM channel 261C1 at Dayton, Nevada would provide additional service ("gain area") to any areas which do not presently receive service from at least 10 full-time broadcast stations.

For the purposes of this study, channel 261C1 at Dayton is assumed to be operating with full Class C1 facilities atop McClellan Butte, the coordinates of which are NL 39° 15' 34" x WL 119° 42' 16". This is the site of KNEV(FM), as well as several other broadcast facilities. Channel 261C1 can operate from atop McClellan Butte as a short-spaced station with respect to stations KQOD 261A Stockton, KRCX 260B Marysville, KCIV 260B Mt. Bullion, and KSPY 262A Quincy. In order to operate with full Class C1 power, a directional antenna pattern would be necessary in order to provide the requisite contour protection with respect to KRCX, KCIV and KSPY. An appropriate directional antenna pattern has been assumed for this study.

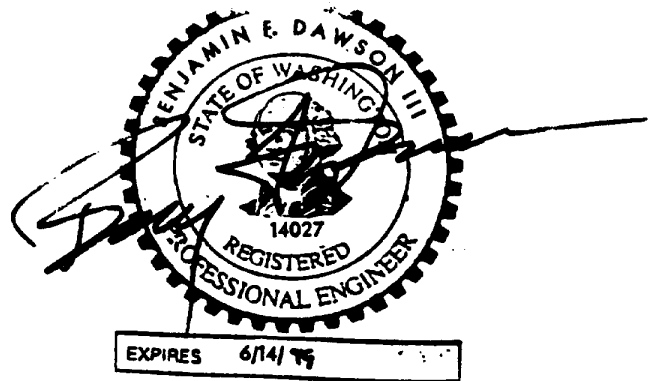
The resulting gain area over the licensed omnidirectional KTHX operation atop Slide Mountain on channel 261C2 encompasses 7,106 km² and 24,146 persons (1990 Census). There is also an associated loss area, encompassing 12 km² and 4 persons (1990 Census).

The results of this study show that the entire gain area and the entire loss area presently receive service from at least 10 full-time broadcast stations. Each of the ten FM stations listed below provides 60 dBu service to 100% of the gain area.

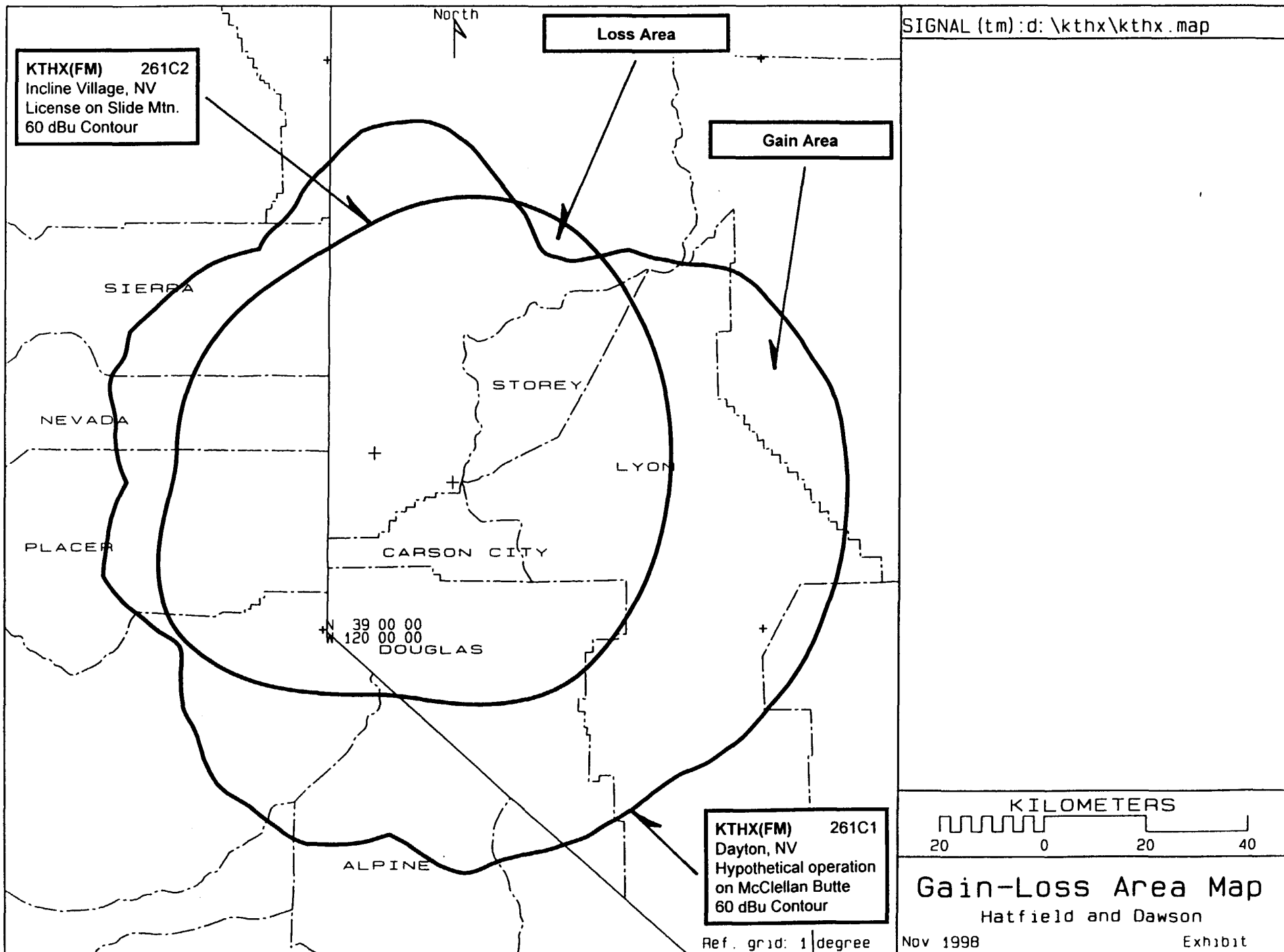
KUNR 204C Reno
KKTO 213C Tahoe City
KNIS 217C Carson City
KNEV 238C Reno
KWNZ 247C Carson City

KBUL 251C Carson City
KZZF 275C South Lake Tahoe
KDOT 283C Reno
KOZZ 289C Reno
KRNO 295C Reno

Signed this 16th day of November, 1998.



Benj. F. Dawson III, P.E.



ATTACHMENT 2

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Engineering Statement

An engineering study has been conducted in order to determine the gain and loss areas associated with the proposed reallocation of FM Channel 261C2 at Incline Village, Nevada to FM Channel 261C1 at Dayton, Nevada.

For the purposes of this study, Channel 261C1 at Dayton is assumed to be operating with full Class C1 facilities at the allotment site, the coordinates of which are NL 39° 29' 27" x WL 119° 19' 03".

Population figures listed in this statement have been calculated from the 1990 Census using the "block centroid" method.

Loss Area

The loss area, compared with the licensed KTHX operation atop Slide Mountain on Channel 261C2, encompasses 3,136 km² and 77,820 persons. The entire loss area is well-served, presently receiving service from at least 5 full-time radio stations. Each of the five FM stations listed below provides 60 dBu service to 100% of the loss area.

KUNR 204C	Reno
KKTO 213C	Tahoe City
KNIS 217C	Carson City
KNEV 238C	Reno
KWNZ 247C	Carson City

Gain Area

The gain area encompasses 11,454 km² and 33,303 persons. 69% of the gain area (7922 km²) is well-served, presently receiving full-time service from at least five other radio stations. The population of the "well-served" portion of the gain area is 32,754 persons. A complete list of the stations providing service to any portion of the gain area is attached.

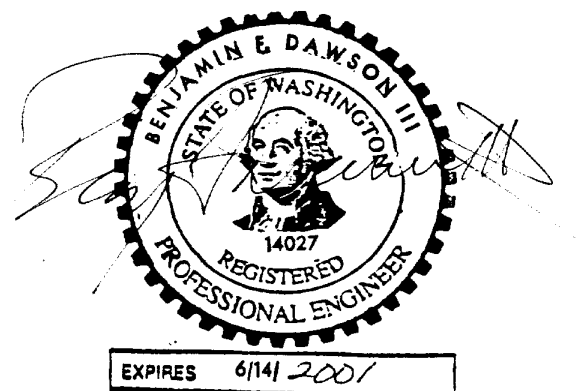
Underserved Area: 31% of the gain area (3532 km²) is currently underserved, i.e. receiving full-time service from fewer than five radio stations. This area has a population of 549 persons.

Gray Area: 10% of the gain area (1131 km²) currently receives full-time service from just one other radio station, that being KNHK 225C at Reno. The 1990 Census indicates that 3 persons reside within this area.

White Area: 0.3% of the gain area (32 km²) currently receives full-time service from no other radio stations. The 1990 Census indicates that the population of this area is zero.

I, Benjamin F. Dawson III, hereby declare that the facts set out in the foregoing Engineering Statement, except those of which official notice may be taken, are true and correct.

Signed this 6th day of August, 1999.



Benj. F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers

**FM Stations Which Provide 60 dBu Service
To Some Portion of the Gain Area**

Call Status	City State	FCC File No.	Channel Freq.	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	Distance kilometers
KUNR LIC	RENO NV	BMLD930412KA	204C 88.7	20.0 661.0	39-15-34 119-42-16	0.0	0.00
KKTO LIC	TAHOE CITY CA	BLED970902KB	213C 90.5	38. 896.0	39-18-38 119-53- 1	290.3	16.43
KNIS LIC	CARSON CITY NV	BLED891016KA	217C 91.3	67. 660.0	39-15-30 119-42-36	255.5	0.49
KSRN LIC	SPARKS NV	BLH930825KC	221A 92.1	4.1 119.0	39-35- 2 119-47-52	347.5	36.94
KNHK LIC	RENO NV	BLH901228KC	225C 92.9	45. 809.0	39-39- 8 119-27-46	25.3	48.33
KATG LIC	SUN VALLEY NV	BLH981028KD	229A 93.7	3.6 DA 129.0	39-35- 2 119-47-54	347.4 SS	36.95
KNEV LIC	RENO NV	BLH921029KA	238C 95.5	60. 695.0	39-15-34 119-42-16	0.0	0.00
KLCA LIC	TAHOE CITY CA	BLH980116KC	243C1 96.5	6.1 903.0	39-18-38 119-53- 1	290.3 SS	16.43
KWNZ LIC	CARSON CITY NV	BMLH860530KA	247C 97.3	87. 644.0	39-15-21 119-42-37	231.4	0.64
KBULFM LIC	CARSON CITY NV	BLH950504KB	251C 98.1	74. 699.0	39-15-32 119-42- 6	104.5	0.25
KGVM LIC	GARDNERVILLE-MINDEN NV	BLH980612KA	256A 99.1	3.0 DA -249.0	38-57-35 119-50-36	199.8	35.40
KVLVFM LIC	FALLON NV	BMLH900529KB	257A 99.3	3.7 76.0	39-29-47 118-48-50	70.7	80.91
KRZQFM LIC	SPARKS NV	BLH910830KB	265A 100.9	6.0 62.0	39-22- 4 119-47- 7	330.0	13.90

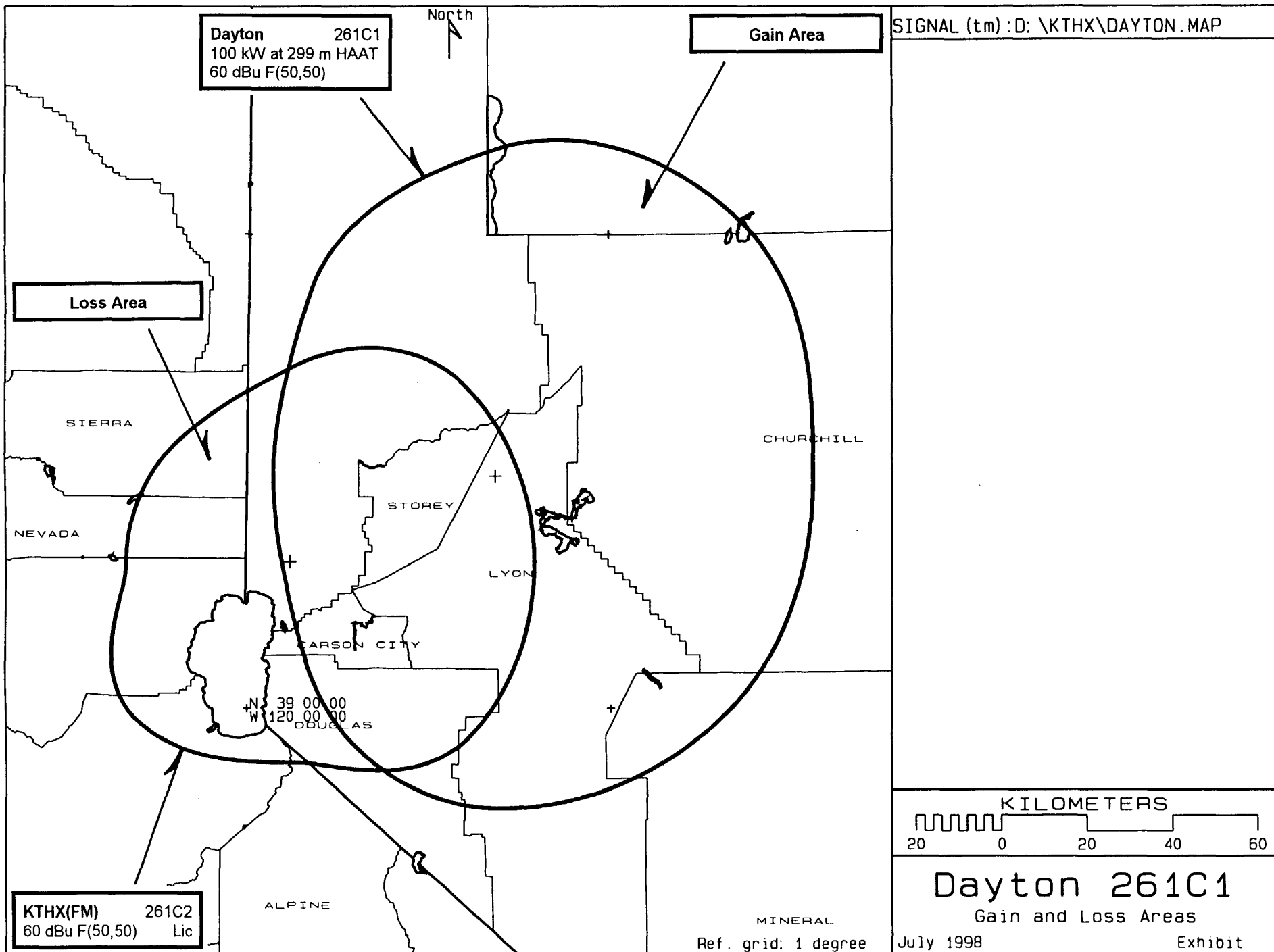
Hatfield & Dawson Consulting Engineers

**FM Stations Which Provide 60 dBu Service
To Some Portion of the Gain Area (Cont.)**

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Distance kilometers
KRNG LIC	FALLON NV	BLH970722KA	267C2 101.3	1.65 673.0	39-42-30 119-10-16	42.4	67.69
KRNVFM LIC	RENO NV	BLH941122KA	269C3 101.7	11.0 DA 150.0	39-35- 3 119-47-52	347.5 SS	36.97
KZZF CP	SOUTH LAKE TAHOE CA	BPH960417IA	275C 102.9	40.0 880.0	39-18-37 119-53- 1	290.2	16.41
KODS LIC	CARNELIAN BAY CA	BLH880930KD	279C1 103.7	6.3 910.0	39-18-38 119-53- 1	290.3	16.43
KDOT LIC	RENO NV	BMLH950831KA	283C 104.5	25.0 893.0	39-18-48 119-52-59	291.4	16.49
KOZZFM LIC	RENO NV	BLH810202AA	289C 105.7	75. 664.0	39-15-34 119-42-21	284.5	0.12
KRNOFM LIC	RENO NV	BLH870805KC	295C 106.9	37. 911.0	39-18-38 119-53- 1	290.3	16.43

**AM Stations Which Provide
Interference-Free Service
To Some Portion of the Gain Area**

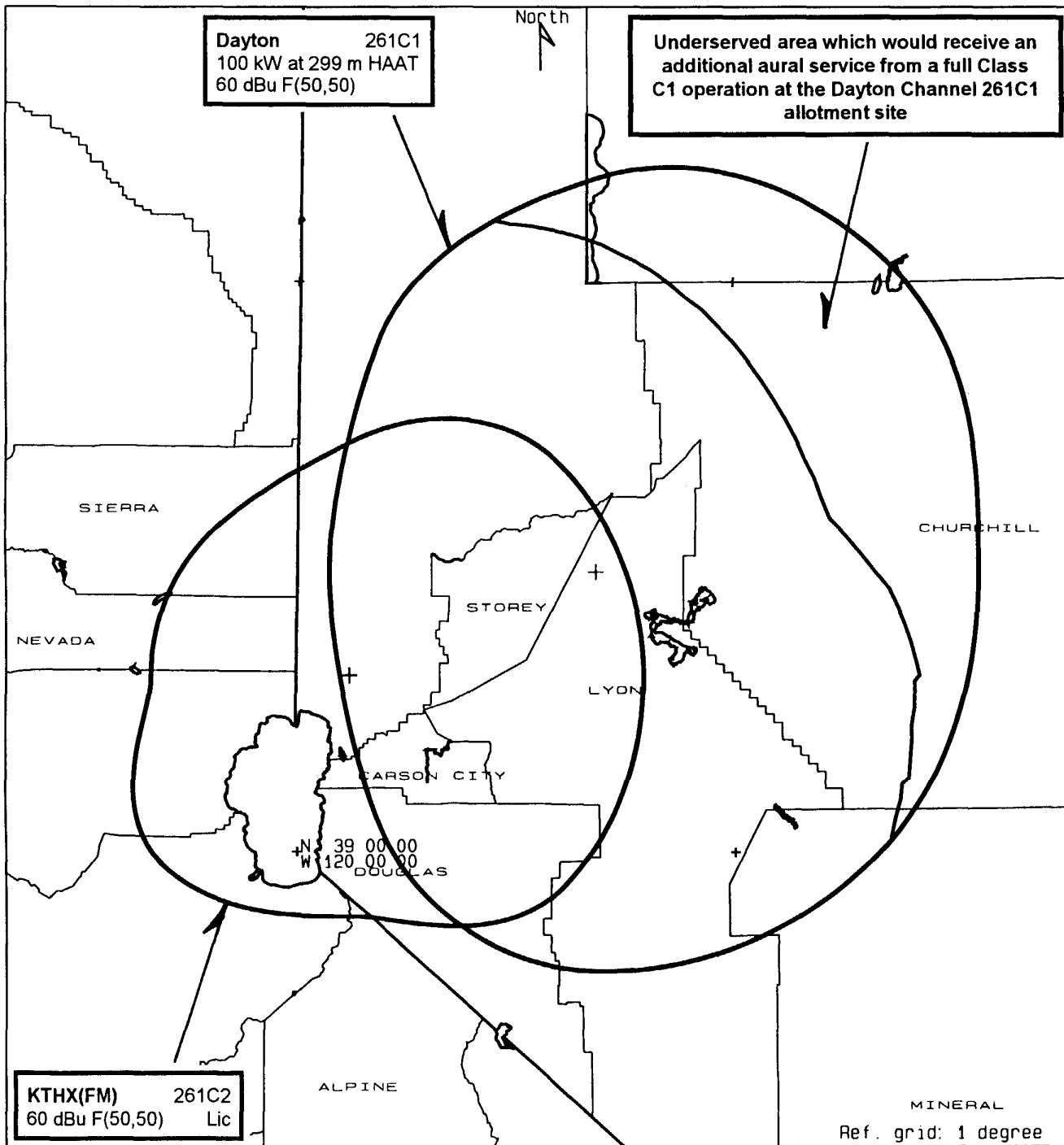
Call Status	City St Co	FCC File No.	Freq Mode	Power(kW) Hours	Latitude Longitude	Bearing deg-True	Distance kilometers
KKOH LIC	RENO NV US		780 DAN	50.000 DAY	N 39-40-41 W 119-48-06	349.9	47.26
KKOH LIC	RENO NV US		780 DAN	50.000 NITE	N 39-40-41 W 119-48-06	349.9	47.26



Dayton 261C1
100 kW at 299 m HAAT
60 dBu F(50,50)

Underserved area which would receive an
additional aural service from a full Class
C1 operation at the Dayton Channel 261C1
allotment site

SIGNAL (tm):D:\KTHX\DAYTON.MAP



KTHX(FM) 261C2
60 dBu F(50,50) Lic

MINERAL
Ref. grid: 1 degree

KILOMETERS
20 0 20 40 60

Dayton 261C1
Underserved Area

July 1998

Exhibit

